

# EXHIBIT J

**Christina P. Mott**

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**From:** exeterlaw@aol.com  
**Sent:** Friday, November 17, 2017 3:33 PM  
**To:** Christina P. Mott  
**Subject:** Re: RE: Falletta v. Hoertdoerfer et al. - NOTD  
**Attachments:** image001.png

That was a date on which Dr. Connelly is available as am I..

I do not have the date constraints that others do,

Mark

In a message dated 11/17/2017 3:12:05 PM Eastern Standard Time, CMott@adlercohen.com writes:

Mark, Lindsay,

We have several moving pieces here to work out:

1. We need a date on which all counsel and Dr. Connelly are available (December or January) to reschedule his depo
2. We need a date on which all counsel and both plaintiffs are available to hold depositions of Mr. and Mrs. Falletta.

Mark:

Of those January dates, are you saying that the 26<sup>th</sup> is the only date on which you are available? If so, that poses a difficult challenge for getting three depositions done

Adler|Cohen|Harvey|Wakeman|Guekguezian LLP

Massachusetts | Rhode Island | New Hampshire

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**From:** [exeterlaw@aol.com](mailto:exeterlaw@aol.com) [mailto:[exeterlaw@aol.com](mailto:exeterlaw@aol.com)]

**Sent:** Friday, November 17, 2017 10:59 AM

**To:** Jean M. Ritrovato; [lfaucher@Gssp-lawyers.com](mailto:lfaucher@Gssp-lawyers.com); [EHurley@Gssp-lawyers.com](mailto:EHurley@Gssp-lawyers.com); Christina P. Mott; [cpoulin@gssp-lawyers.com](mailto:cpoulin@gssp-lawyers.com)

**Cc:** Lynne M. Perez; Ellen Epstein Cohen

**Subject:** Re: RE: Falletta v. Hoertdoerfer et al. - NOTD

I, and my client are available on 1/26/2018

Mark Sullivan

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In a message dated 11/17/2017 10:34:34 AM Eastern Standard Time, [JRitrovato@adlercohen.com](mailto:JRitrovato@adlercohen.com) writes:

In accordance with your list, please note that the following dates are currently available in January for Attorney Christina P. Mott for the Depositions of the Plaintiffs. Please let me know your choice asap.

Wednesday 1/3/18

Friday 1/5/18

Tuesday 1/9/18

Thursday 1/11/18

Friday 1/12/18

Tuesday 1/16/18

Thursday 1/18/18

Friday 1/19/18

Tuesday 1/23/18

Friday 1/26/18

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**From:** Lindsay Faucher [mailto:[lfaucher@Gssp-lawyers.com](mailto:lfaucher@Gssp-lawyers.com)]  
**Sent:** Wednesday, November 15, 2017 3:47 PM  
**To:** Elizabeth Hurley; [exeterlaw@aol.com](mailto:exeterlaw@aol.com); Christina P. Mott; Chris J. Poulin  
**Cc:** Lynne M. Perez; Jean M. Ritrovato; Ellen Epstein Cohen  
**Subject:** RE: Falletta v. Hoertdoerfer et al. - NOTD

All,

The following dates are currently available in January for both Attorneys Poulin & Hurley for depositions:

Wednesday 1/3/17

Thursday 1/4/17

Friday 1/5/17

Tuesday 1/9/17

Wednesday 1/10/17

Thursday 1/11/17

Friday 1/12/17

Tuesday 1/16/17

Thursday 1/18/17

Friday 1/19/17

Tuesday 1/23/17

Wednesday 1/24/17

Friday 1/26/17

**These dates are not being held.**

I do not yet have confirmation from our clients on their availability. I will get back to you with that information as soon as possible.

**The deposition of Dr. Hoertdoerfer is scheduled for Friday February 2, 2018 at 10:00 a.m. at our office.**

Thank you,

Lindsay Faucher

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**From:** Elizabeth Hurley

**Sent:** Wednesday, November 08, 2017 5:30 PM

**To:** Christina P. Mott; Chris J. Poulin

**Cc:** [exeterlaw@aol.com](mailto:exeterlaw@aol.com); Lindsay Faucher; Lynne M. Perez; Jean M. Ritrovato; Ellen Epstein Cohen;

Lindsay Faucher  
**Subject: RE: Falletta v. Hoertdoerfer et al. - NOTD**

Hi Christina,

We are going to have to change the date. I have a hearing in Boston that day and then surgery the week after. I know Chris is booked, as well, because he was supposed to go to the hearing with me and bagged out due to a conflict. I apologize but we will have to aim for January. Lindsay will send some dates out.

Elizabeth

**Elizabeth Hurley, Esq**

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